

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

In the Matter of	)	
	)	
Distribution of 2000, 2001, 2002	)	Docket No. 2008-2 CRB CD
And 2003 Cable Royalty Funds	)	2000-2003 (Phase II) (Remand)
_____	)	

**INDEPENDENT PRODUCERS GROUP**  
**REBUTTAL TO THE WRITTEN DIRECT STATEMENT**  
**OF THE SETTLING DEVOTIONAL CLAIMANTS**

Worldwide Subsidy Group LLC (a Texas limited liability company) dba  
Independent Producers Group ("IPG") hereby submits its rebuttal testimony and  
exhibits in the above-captioned proceeding.

IPG will present one witness:

1. Raul Galaz, a consultant to IPG.

Mr. Galaz will sponsor the exhibits referenced in and appended to his  
testimony.

**INDEPENDENT PRODUCERS GROUP REBUTTAL TO THE WRITTEN**  
**DIRECT STATEMENT OF THE SETTLING DEVOTIONAL CLAIMANTS**

IPG maintains that it is entitled to percentages of the Phase II royalties allocated to the Devotional Programming category, as more specifically set forth in the IPG Written Direct Statement, but reserves its right to revise its claim in light of evidence presented in this proceeding.

Respectfully submitted,

Dated: January 8, 2018

\_\_\_\_\_/s/\_\_\_\_\_  
Brian D. Boydston, Esq.  
California State Bar No.155614

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Attorneys for Independent Producers  
Group

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of January, 2018, a copy of the foregoing was sent by overnight mail to the parties listed on the attached Service List.

\_\_\_\_\_/s/\_\_\_\_\_  
Brian D. Boydston

### **DEVOTIONAL CLAIMANTS:**

Clifford M. Harrington  
Matthew MacLean  
**PILSBURY WINTHROP SHAW PITTMAN LLP**  
1200 Seventeenth Street NW  
Washington, DC 20036

**INDEPENDENT PRODUCERS GROUP REBUTTAL TO THE WRITTEN  
DIRECT STATEMENT OF THE SETTLING DEVOTIONAL CLAIMANTS**

## Certificate of Service

I hereby certify that on Monday, January 08, 2018 I provided a true and correct copy of the INDEPENDENT PRODUCERS GROUP REBUTTAL TO THE WRITTEN DIRECT STATEMENT OF THE SETTLING DEVOTIONAL CLAIMANTS to the following:

Settling Devotional Claimants (SDC), represented by Clifford M Harrington served via Electronic Service at [clifford.harrington@pillsburylaw.com](mailto:clifford.harrington@pillsburylaw.com)

Signed: /s/ Brian D Boydston